

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
)	
Plaintiff,)	
vs.)	No. 18-03057-CR-S-MDH
)	
KEYSHAUN JACKSON,)	
)	
Defendant.)	

MOTION TO CONTINUE SENTENCING HEARING

Comes now Defendant, James Jackson, by counsel, and moves this Court to continue his sentencing hearing from the scheduled date of April 23, 2019, for the parties to further develop evidence material to the Court's sentencing decision.

SUGGESTIONS IN SUPPORT

1. The Presentence Report (PSR) finds in ¶22 that Mr. Jackson's criminal history subjects him to the enhanced penalty of 18 U.S.C. § 924(e). Mr. Jackson has objected to this classification. However, Mr. Jackson may be in a position to withdraw that objection.

2. Counsel for Mr. Jackson has conferred with Counsel for the Government, William Meiners, who agrees that a continuance of this matter will conserve judicial resources and allow the parties to develop relevant evidence for sentencing and to ensure Mr. Jackson receives due process and that his constitutional rights are protected. Mr. Jackson also concurs with this requested continuance.

WHEREFORE, Mr. Jackson requests that this Court continue his sentencing

hearing from the scheduled date of April 23, 2019.

Respectfully submitted,

/s/ Ann M. Koszuth

ANN M. KOSZUTH, #47046

Assistant Federal Public Defender

901 St. Louis Street, Suite 801

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Attorney for Defendant

April 18, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case, and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Ann M. Koszuth

ANN M. KOSZUTH